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Your memo
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Our reference MPL kra0792/ 02

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Date 13.12. 2002
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Comments to Docket No. FAA-202-13464

JAA-02-13464.43

Supplemental Notice of Proposed Rulemaking

Ref: RIN 2120-AC84

Title: **Improved Seats** in Air Carrier Transport Category Airplanes

14 CFR Part 121: **Operating Requirements**: Domestic, Flag, and Supplemental Operations

Requirement: **§121.311 Seats, Safety Belts and Shoulder Harnesses**

RECARO AIRCRAFT SEATING GmbH & Co would like to make the following comments to retrofit of seats which comply with 14 CFR 25.562:

1. In 1988 Amendment 25-64 introduced emergency landing dynamic conditions to be incorporated into the certification basis of newly designed airplanes, in order to considerably improve the safety of seated occupants.
Fourteen years have since passed without pre Amendment 25-64 airplanes being up-graded to this safety level.

This CNPRM allows either 4 or 14 years for existing or new aircraft, respectively, to elapse before retrofits must have been completed. At least 28 years will have passed since 1988 until all eligible aircraft will have been retrofitted.

In the interest of improving passenger safety within a shorter time frame, the outer limit of 14 years should be significantly reduced. A two or four year period replacing the 4 or 14 year period, should be adequate to allow all involved parties to develop, produce and retrofit seats for affected aircraft fleets.

Please consider changing the time frames as proposed.

2. It is understood that if, within the 14 year outer limit period, a seat is replaced by a seat of the same type but with a different Part Number, the replaced seat shall be 16g compliant.

The wording used at the end of the 2nd paragraph of the section "New Proposal: "... replaces an existing seat with a different type of seat, ..." is contradictory. Clarification is requested.

Replacement definition criteria such as type or part number notwithstanding, once the definition of replacement is fulfilled for a particular aircraft, a grace period of at least 9

months shall be introduced in order to allow the seat manufacturer to re-certify and manufacture the replacement seats.

3. It needs to be pointed out that when a 16g compliant seat is retrofitted behind existing 9g seat, this seating section would also need to be replaced in order to fulfill the seat to seat HIC requirement of 14 CFR 25.562 (c)(5).
E.g., in layouts where the economy class borders directly on the business class, the business class seating would also have to be replaced in order to fulfill the seat to seat HIC requirement.
Please clarify the requirements on the replacement of one, some or all seats in a section or in a complete aircraft.
4. 14 CFR 25.562 compliant seats which have been previously dynamically tested using seat track of present 16g compliant aircraft would have to be re-certified with the seat track, from aircraft which presently do not include 14 CFR 25.562 in their Type Certification Basis.
How shall situations where the seat track fails thus resulting in a failed 16g cert. test be handled? Clarification is requested.



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